

GEORGE B. FREEHILL  
WILLIAM L. JUSKA, JR.  
JAMES L. ROSS\*  
ERIC E. LENCK  
JOHN J. WALSH\*  
PATRICK J. BONNER\*  
PETER J. GUTOWSKI  
MARK F. MULLER  
WAYNE D. MEEHAN\*  
DON P. MURNANE, JR. &  
THOMAS M. RUSSO  
THOMAS M. CANEVARI\*  
MICHAEL FERNANDEZ\*  
JOHN F. KARPOUSIS\*<sup>2</sup>  
MICHAEL E. UNGER\*<sup>1</sup>  
WILLIAM J. PALLAS\*  
GINA M. VENEZIA\*<sup>2</sup>  
LAWRENCE J. KAHN\*  
BARBARA C. CARNEVALE\*  
MANUELA A. MOLINA  
JUSTIN T. NASTRO\*  
PAMFILA L. SCHULTZ\*<sup>1</sup>  
DANIEL J. FITZGERALD\*<sup>1</sup>  
MICHAEL C. ELLIOTT\*  
JAN P. GISHOLT\*

\* ALSO ADMITTED IN NEW JERSEY  
\* ALSO ADMITTED IN CONNECTICUT  
\* ALSO ADMITTED IN WASHINGTON, D.C.  
\* ALSO ADMITTED IN LOUISIANA

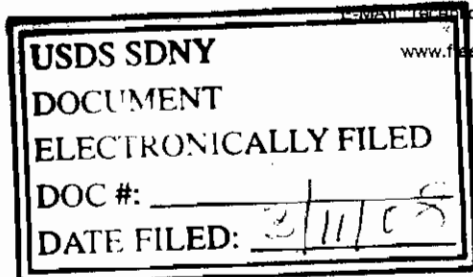
LAW OFFICES OF  
FREEHILL, KUTNER & MULLER LLP  
80 PINE STREET  
NEW YORK, N.Y. 10005-1759

TELEPHONE (212) 425-1900

FACSIMILE (212) 425-1901

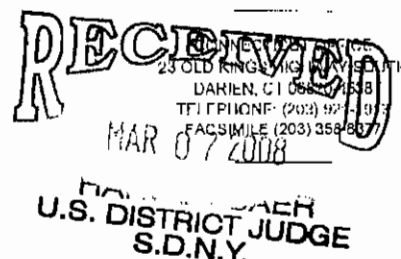
EMAIL: [info@freehill.com](mailto:info@freehill.com)

[www.freehill.com](http://www.freehill.com)



March 7, 2008

NEW JERSEY OFFICE  
649 SUMMIT AVENUE  
JERSEY CITY, N.J. 07306-2701  
TELEPHONE (973) 623-5514  
FACSIMILE (973) 823-3813



OUR REF: 78/MEU/SL

**BY FAX (212) 805-7901**

The Hon. Harold Baer, Jr.  
United States District Judge  
Southern District of New York  
Daniel P. Moynihan U.S. Courthouse  
500 Pearl Street, Room 2230  
New York, NY 10007

Re: Sixteen Thirteen Marine S.A. v. Congentra A.G.  
08 CV 1318 (HB) – SDNY

Dear Judge Baer:

We represent Plaintiff Sixteen Thirteen Marine S.A. in the above-captioned matter and write to respectfully request that the Court permit additional time for Plaintiff to serve and file its papers in opposition and to adjourn the oral argument on Defendant Congentra A.G.'s motion which seeks to vacate a maritime attachment. We have requested Defendant's agreement to an extension of the briefing schedule but that requested has been refused.

Defendant's voluminous moving papers, nearly four inches in thickness, were filed late in the evening on March 5, 2008 and not seen by the undersigned until the next day. The motion primarily attacks Plaintiff's underlying claims as lacking in merit and suggests that Plaintiff has misrepresented the facts in its Amended Complaint upon which the attachment, which was brought to secure claims being arbitrated in London, is based. Defendant submits the Declarations of four individuals, relying on numerous documents appended as exhibits, to attempt to demonstrate the supposed fallaciousness of Plaintiff's claims, the merits of which will be decided by the arbitrators in London. In addition, Defendant further argues that Plaintiff cannot recover on its claims as a matter of English law and submits the Declarations of a former Judge of the London Commercial Court and Defendant's London solicitor in support of its

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interpretations. (We note the exhibits to one of these Declarations were not received until today.) Defendant relies heavily on the assertions made in both Declarations, quoting almost four consecutive pages of single-spaced text from the one Declaration in its Memorandum of Law in Support of the Motion to Vacate.

At present Plaintiff's opposition papers in response to Defendant's arguments are due to be served and filed by March 13, 2008. Defendant's reply papers are due at 9:00 a.m. on March 17 with oral argument scheduled for 2:00 p.m. the same day.

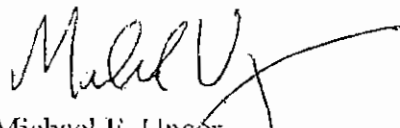
In order to be able to respond to the numerous factual and legal arguments made by Defendant, the assistance of Plaintiff's London solicitor is critical. The undersigned has explained to Defendant's counsel that Plaintiff's solicitor is traveling out of the office from today through the middle of next week and will be unable to assist in preparing Plaintiff's opposition or in liaising with an English barrister to obtain a Declaration in response to that submitted by the former Judge before the current deadline. In addition, I have depositions scheduled out of town witnesses in a multi-million dollar cargo action set for Tuesday and Wednesday of next week which I am unable at this point to adjourn. Notwithstanding the above, Defendant's counsel has advised that his client will not consent to an adjournment of the briefing schedule and argument date.

Under the circumstances, Plaintiff respectfully requests that the Court extend the deadline for Plaintiff's opposition papers to March 25, 2008 so as to provide it the benefit of advice from its English solicitor. If the Court is agreeable to the extension, Defendant's counsel has requested until April 1, 2008 to submit reply papers and for oral argument to be heard at the Court's earliest opportunity.

We thank the Court for its courtesy and attention to this request.

The oral argument is hereby  
 adjourned to March 27, 2008,  
 at 2:30 p.m. in Courtroom 23B.

Respectfully submitted,  
 FREEHILL HOGAN & MAHAR LLP

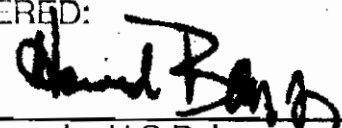
  
 Michael E. Unger

The deadline for Plaintiff's  
 opposition papers shall be

March 21, 2008, and the deadline for any reply shall be  
 MEU/mc March 25, 2008.

cc: BY FACSIMILE (212) 490-6070  
 Lennon, Murphy & Lennon, LLC  
 Attn: Kevin J. Lennon

SO ORDERED:

  
 Harold Baer, Jr., U.S.D.J.

Date: March 10, 2008

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FREEHILL, HOGAN & MAHAR LLP

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Endorsement: The oral argument is hereby adjourned to March 27, 2008, at 2:30 p.m. in  
Courtroom 23B. The deadline for Plaintiff's opposition papers shall be March 21, 2008,  
and the deadline for any reply shall be March 25, 2008.